



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region 1  
1 Congress Street, Suite 1100  
BOSTON, MA 02114-2023

**CONTAINS ENFORCEMENT-SENSITIVE INFORMATION**

**MEMORANDUM**

**DATE:** September 24, 2009

**SUBJ:** Request for a Removal Action at the Parsons Paper Mill Site,  
Holyoke, Massachusetts - **Action Memorandum**

**FROM:** Athanasios Hatzopoulos, On-Scene Coordinator (OSC)  
Emergency Response and Removal Section II

**THRU:** Steven R. Novick, Chief  
Emergency Response and Removal Section II

Arthur V. Johnson, III, Branch Chief  
Emergency Planning & Response Branch

**TO:** James T. Owens, III, Director  
Office of Site Remediation and Restoration

**I. PURPOSE**

The purpose of this Action Memorandum is to request and document approval of the proposed removal action at the Parsons Paper Mill Site, (the Site), which is located at 84 Sargeant Street, Holyoke, Hampden County, Massachusetts. On June 9, 2008, a fire destroyed approximately 50% of the mill which is made up of five interconnected buildings. The mill buildings ranged from two to four stories in height that once occupied approximately 330, 642 square feet. The fire burned down two sections of the mill.

Friable asbestos and asbestos-containing material (ACM) present through out the Site, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to pose a threat to human health. There has been no use of the OSC's \$200,000 warrant authority.

**II. SITE CONDITIONS AND BACKGROUND**

**CERCLIS ID# :** MAD001114362  
**SITE ID# :** 01FZ

**CATEGORY :** Time Critical

**A. Site Description**

**1. Removal site evaluation**

Due to the Site conditions and potential threat of release of friable asbestos from the Site, in March 2009, the Massachusetts Department of Environmental Protection (MassDEP) referred the Site to the Emergency Planning and Response Branch (EPRB) for further investigation.

On April 9, 2009, EPA OSC Hatzopoulos met with Bernard Fish and David Slowick of the MassDEP to discuss their concerns regarding this Site and to observe current Site conditions. Because neither agency had official access approval from the property owners to enter the Site, the visual reconnaissance was conducted from the exterior of the property. The June 9, 2008 fire burned approximately 50% of the building, reducing it to rubble. The MassDEP 2008 sampling activities revealed the presence of friable asbestos, up to 40% in the burned rubble. One of MassDEP's concerns is that airborne asbestos is a potential exposure threat to the surrounding community because the Site is located within 800 yards from the center of downtown Holyoke. Downtown Holyoke's land use includes a mix of commercial, industrial, and residential areas. During the visit, high pedestrian foot traffic was noticed in the immediate area, in particular a group of toddlers from a near-by daycare center were observed walking across the Street. After the Site visit, the OSC decided that the Site conditions warrant that a further investigation be conducted.

On September 2, 2009, the EPRB and its Technical Assessment and Response Team, Weston Solutions, Inc. (START), conducted a Preliminary Assessment and Site Investigation (PA/SI). The PA/SI included collecting for asbestos analysis, debris and pipe insulation material that had fallen on the Site for asbestos content. The structurally unsafe areas around the remaining portions of the building, allowed only 10 samples to be collected. The samples were analyzed at EPA's New England Regional Laboratory (NERL). The analysis revealed that friable asbestos (up to 14%) is present in the burned areas. Asbestos-like pipe insulation material was also visible in other locations but could not be accessed. Moreover, MassDEP provided EPA additional data that confirmed the EPA analysis that asbestos exists at the Site. The data consisted of samples collected in August 2008, by MassDEP and Tighe & Bond (a consultant to the owner of the Site). The MassDEP samples revealed friable asbestos up to 40% in the burned rubble and the Tighe & Bond revealed friable asbestos up to 70%.

On September 10, 2009, the MassDEP formally requested EPA to conduct a removal action due to the concerns listed above.

The results of the PA/SI are documented in the report entitled Removal Program Preliminary Assessment/Site Investigation for the Parsons Paper Mill Site, Holyoke, MA., submitted by Weston Solutions, Inc. Region I Superfund Technical Assessment and Response Team III September , 2009.

The PA/SI was concluded and based on Site conditions and preliminary analytical results, a time critical removal action was recommended in a closure memorandum dated September 14, 2009.

## **2. Physical location**

The Parsons Paper Mill Site is located at 84 Sargeant Street, Holyoke, MA. The latitude and longitude of the approximate center are 42° 11' 53" north and 72° 36' 42" east. The Site is more fully described as parcel 005 on Assessor's Map 018, Block 01. It is bordered by Sargeant Street to the northeast, a commercial property and Jackson Street to the southwest, and the City of Holyoke canal system's First and Second Level Canals to the northwest and the southeast respectively.

## **3. Site characteristics**

The Site is comprised of approximately 4.61 acres and is located near the center of Downtown Holyoke in a mixed industrial/commercial/residential area. It is currently zoned for "General Industry" uses although residences are located within 500 feet of the property. The Site is currently owned by the National Vulcanized Fiber (NVF) Company through its subsidiary, Parsons Paper Company, Inc. The Parsons Paper Company had conducted paper making operations at the Site since approximately 1890. It ceased operations in 2005 and has been inactive since then. NVF and Parsons Paper are currently in Chapter 7 Bankruptcy proceedings. On August 13, 2009, the Debtors' Chapter 7 Trustee granted EPA access to the Site to conduct a preliminary assessment and site investigation and also filed a Notice of Intent to Abandon the property with the Bankruptcy Court.

On June 9, 2008, a fire destroyed approximately 50% of the mill which is made up of five interconnected buildings. The mill buildings ranged from two to four stories in height that once occupied approximately 330,642 square feet. The fire burned down two sections of the mill. The largest burned section is the portion situated along the northwestern property line, adjacent to the First Level Canal and adjacent to Sargeant Street. The other burned building is situated adjacent to the southwest and to the south east of the aforementioned building. The remaining portions of the interconnected building complex have been damaged by the fire and are situated in a perpendicular direction (northwest to southeast) relative to the canal system. There are multi-segmented basements and sub-basements throughout the burned and un-burned mill buildings. Apart from the building structures, the Site grounds are generally covered by asphalt pavement or packed gravel for parking uses. The Site is secured by a chain link fence.

According to information provided by the MassDEP, the rubble from the burned and collapsed portion of the mill, estimated to be a volume of approximately 5,000 cubic yards, currently exists in piles at the northern portion of the property, filling portions of the building foundation. This burned rubble contains primarily brick rubble, with some amounts of other solid wastes, including wood and metal. The rubble from the fire is an asbestos-containing waste material according to the MassDEP regulations at 310 CMR 7.00, based on positive asbestos tests of the rubble (demolition debris) and other materials within the mill, which were commingled with the brick rubble during the fire. Sources of asbestos include asphalt shingles, window glazing/caulking, tank and pipe insulation, transite siding, cements/mastics, and floor tiles.

Within a one mile radius of the Site are 32 schools which include daycare centers to public/private schools. The closest day care center is less than .1 mile away, and Holyoke High .8 miles away. The population within one mile radius is 21,876. According to the EPA Region 1 Environmental Justice Mapping Tool, the Site is in an environmental justice area.

**4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant**

The contaminant of concern is friable asbestos. The areas that were sampled are exposed to the elements. Airborne friable asbestos is a health threat to anyone walking on, traveling by or living near the Site. Sampling efforts by EPA, MassDEP and Tighe & Bond documented the presence of asbestos up to 70 %.

**5. NPL status**

The site is not currently on the National Priorities List, and has not received a Hazardous Ranking System rating.

**B. Other Actions to Date**

EPA has not conducted previous removal actions at the Site.

**C. State and Local Authorities' Roles**

**1. State and local actions to date**

In November 2004, the MassDEP determined that a threat of release of oil and hazardous materials existed at the Site due to numerous abandoned drums and containers present within the buildings and within the boundary of the Site. NVF Corporation arranged for the appropriate assessment and disposal of all containers from the Site at that time.

In February 6, 2009, the MassDEP issued a Provisional Beneficial Use Determination ("BUD") permit approval to utilize brick and concrete rubble as fill for the burned portions of the Site. The BUD application was prepared on behalf of the property owner, NVF Company, by their consultant Tighe & Bond. On February 26, 2009, the MassDEP received a letter from the City of Holyoke. The City commented that all asbestos-contaminated rubble should be removed and disposed before crushing activities of the non-asbestos contaminated rubble began. Upon further review, the MassDEP modified the BUD permit, specifying that all demolition and crushing of the standing portion of the mill be kept separate from the burned/collapsed rubble portion, to avoid contamination from (and disturbance of) the asbestos-containing waste material in the burned and collapsed rubble at the property.

**2. Potential for continued State/local response**

MassDEP will continue to be involved with the Site.

### III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

#### A. Threats to Public Health or Welfare

*Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)]* Friable asbestos on the Site poses a direct contact threat to local residents and those who may enter the Site. Although a perimeter fence is present, friable asbestos cannot be contained as it will become airborne with air gusts. In addition, the fire-damaged ruins may act as an attractive nuisance, bringing unauthorized individuals in close contact with the friable asbestos present. People are walking by the Site on a daily basis. In addition, people work and live near the Site. Within a one mile radius of the Site are 32 schools which include 16 daycare centers and 16 public/private schools. The closest day care center is less than .1 mile away, and Holyoke High .8 miles away. The population within one mile radius is 21,876. The Site is located near downtown Holyoke. The population within one mile radius is 21,876.

Asbestos fibers may enter the body by inhalation or ingestion. Breathing asbestos can cause asbestosis, a buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. Symptoms of asbestosis include shortness of breath, coughing, and sometimes heart enlargement. Asbestosis is a serious disease that can lead to disability or death. Asbestos is also a known human carcinogen. Inhalation of high levels of asbestos can cause cancer of the lungs tissue itself and mesothelioma, a cancer of the membrane that surrounds the lung and other internal organs.<sup>1</sup>

*Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)]* As indicated above, friable asbestos is commingled in the burned rubble debris. Wind can cause friable asbestos to migrate to the surrounding community.

*Threat of fire or explosion [§300.415(b)(2)(vi)]* The remaining mill buildings are abandoned and lack functioning fire suppression equipment. In case of a fire, friable asbestos from the buildings will become airborne and migrate to the surrounding areas.

*The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)]* MassDEP has indicated that due to other program priorities and staffing limitations, they do not have the resources currently available to address the Site.

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<sup>1</sup> Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Tox FAQs Fact Sheet for Asbestos*, September 1996

#### **IV. ENDANGERMENT DETERMINATION**

Friable asbestos and asbestos-containing material (ACM) present through out the Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare.<sup>2</sup>

#### **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

##### **A. Proposed Actions**

##### **1. Proposed action description**

The actions required to mitigate the threats outlined herein, are given below. At this time, indications are that the PRP will not perform this work. The proposed actions will protect public health, and welfare.

- 1) Conduct a Site walk with the Emergency Rapid Response contractor (ERRS).
- 2) The Site will be secured to prevent unauthorized access. Site security may be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site. Should an extended period of storage be required, some other means of securing the Site may be implemented.
- 3) Evaluate the structural integrity of the remaining building portions to determine their stability and potential for collapse.
- 4) Stabilize the areas that are structurally unsafe to enable contractor personnel to conduct the removal action. If the need arises, dismantle the unstable sections to permit access to asbestos, and ACM commingled debris.
- 5) Conduct the removal and disposal of asbestos and ACM debris. The process shall include provisions for on site decontamination of larger debris, and segregation of asbestos-free debris. Asbestos material and asbestos contaminated waste will be documented, and shipped off site for disposal at EPA-approved facilities. All wastes will be staged in a secure area on-site while awaiting shipment to CERCLA compliant off-site disposal facilities.
- 6) Conduct multi-media sampling as needed to support the above activities.
- 7) Conduct additional investigation on any found drums and other containers remaining at the Site. If drums/containers are found to contain hazardous substances, they will be repackaged,

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<sup>2</sup> In accordance to OSWER Directive 9360.0-34, an endangerment determination is made based on collaboration with trained risk assessors and relevant action levels or cleanup standards promulgated by the federal government or applicable state regulations.

categorized, staged, manifested, and shipped off-site for disposal at EPA-approved facilities. If they contain oil product they will be referred to the MassDEP.

8) After the asbestos containing debris is removed, conduct grade and backfill activities as needed to secure the open excavated areas of the Site. (Completion of this task may be contingent upon approval of the MassDEP and the City of Holyoke to allow EPA to use the clean brick rubble as fill, or other backfill being provided by the City or another stakeholder of the project.)

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-Site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

Where practicable, final disposal of waste from the Site will utilize an alternative technology to landfilling. The specific treatment and disposal technology will depend on factors such as the quantity and hazardous characteristics, as well as the availability of alternate technologies.

## **2. Community relations**

As noted previously, the Site is located near downtown Holyoke. Upon approval of the Action Memorandum, the OSC will coordinate with the EPA Community Involvement Office to disseminate information regarding the project to the impacted residents. The OSC will also initiate and maintain an EPA OSC web site on the progress of the Removal Action. EPA will continue to work closely with the City, and state officials as the project progresses.

## **3. Contribution to remedial performance**

The cleanup proposed in this Action Memorandum is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site will be consistent with and will not impede any future responses.

## **4. Description of alternative technologies**

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques may be utilized during the removal action.

## **5. Applicable or relevant and appropriate requirements (ARARs)**

Federal ARARs will be met to the extent practicable considering the exigencies of the situation. The OSC has asked for and will coordinate with State officials to identify additional State ARARs, if any, and will meet, to the extent practicable, each ARAR identified in a timely manner.

## **6. Project schedule**

Duration of the removal action activities shall be 12 months from the day of its commencement.

**B. Estimated Costs**

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$1,300,000.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$ 200,000.00
Extramural Subtotal		\$1,500,000.00
Extramural Contingency	20%	\$ 300,000.00
<b>TOTAL, REMOVAL ACTION CEILING</b>		<b>\$1,800,000.00</b>

**VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN**

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment.

**VII. OUTSTANDING POLICY ISSUES**

There are no precedent setting policy issues associated with this site.

**VIII. ENFORCEMENT ... For Internal Distribution Only**

See attached Enforcement Strategy.

The total EPA costs for this removal action based on full-time accounting practices that will be eligible for cost recovery are estimated to be \$1,800,000 (extramural costs) + \$75,000 (EPA intramural costs) = \$1,875,000 X 1.3151 (regional indirect rate) = \$2,465,812<sup>3</sup>.

**IX. RECOMMENDATION**

This decision document represents the selected removal action for the Parsons Paper Site in Holyoke, MA, developed in accordance with CERCLA, as amended, and not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

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<sup>3</sup>Direct Costs include direct extramural costs \$1,800,000 and direct intramural costs \$75,000. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific costs [31.51% x \$1,875,000], consistent with the full accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.



Conditions as the Site meet the NCP Section 300.415 (b) criteria for a removal action are based on the following:

*Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i);*

*Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];*

*Threat of fire or explosion [§300.415(b)(2)(vi);*

*The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)].*

I recommend that you approve the proposed removal action. The total removal action project ceiling if approved will be \$1,800,000. Of this total, no more than \$1,600,000 comes from the Regional removal allowance.

APPROVAL: \_\_\_\_\_



DATE: \_\_\_\_\_

9-24-09

DISAPPROVAL: \_\_\_\_\_

DATE: \_\_\_\_\_